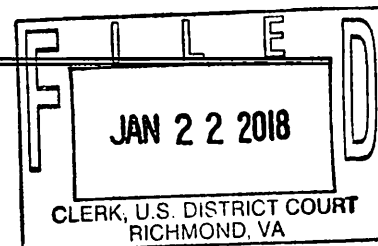


## UNITED STATES DISTRICT COURT

for the  
Eastern District of Virginia

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

4436 Angus Road  
Richmond, VA 23234

Case No. 3:18SW14

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, fully incorporated by reference herein;

located in the Eastern District of Virginia, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, fully incorporated by reference herein.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

See Affidavit, Attachment B      See Affidavit, Attachment B

The application is based on these facts:

See attached Affidavit, fully incorporated by reference herein.

- ☐ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


  
Applicant's signature

Steve Lee, Special Agent, HSI  
Printed name and title

Sworn to before me and signed in my presence.

Date: 1/22/2018

City and state: Richmond, Virginia

  
Roderick C. Young  
United States Magistrate Judge

**AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER RULE 41 FOR  
A WARRANT TO SEARCH AND SEIZE**

I, Steve Lee, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. This affidavit is in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the search of residential property occupied by Marcelina MENDOZA-Mendoza, and possibly others, a single-family residence located at 4436 Angus Road, Richmond, Virginia, 23234 (hereinafter referred to as the SUBJECT PREMISES). The SUBJECT PREMISES is more fully described in Attachment A of this search warrant application.

2. The purpose of this application is to seize evidence, more particularly described in Attachment B of this search warrant application, of violations of 8 U.S.C. § 1324(a)(1)(A)(v) conspiracy to commit alien smuggling, 8 U.S.C. § 1324(a)(1)(A)(vi) aiding or abetting the crime of alien smuggling, 18 U.S.C. § 1956 laundering of monetary instruments, and 18 U.S.C. § 1957 engaging in monetary transactions in property derived from specified unlawful activity.

3. Your affiant is a criminal investigator and law enforcement officer of the United States who is empowered by federal law to conduct investigations and make arrests for offenses enumerated in Titles 8, 18, 19, 21, and 31 of the United States Code.

4. Your affiant is a Special Agent with Homeland Security Investigations (HSI) and assigned to the Office of the Assistant Special Agent in Charge in Sells, AZ. Your affiant has been a Special Agent with HSI since September of 2015. During this time, your affiant has been assigned to a general smuggling investigations group and has

conducted investigations involving human smuggling, narcotics smuggling, bulk cash smuggling, weapons offenses, and immigration violations.

5. Prior to becoming a Special Agent with HSI, your affiant was employed as a Border Patrol Agent (BPA) from September 2008 to September 2015. As a BPA, your affiant was assigned to the Ajo Border Patrol Station, Tucson Sector Area of Operations as a patrol agent and member of the Processing and Intelligence Team (PIT), and later as a member of the Alien Smuggler Identification and Deterrence Unit (ASID). As a patrol agent, your affiant conducted enforcement operations in order to deter, interdict, and seize individuals and contraband seeking to enter, or have entered the United States in violation of US immigration laws and customs regulations. While assigned to the PIT/ASID, your affiant conducted intelligence interviews on human and narcotics smugglers, gaining field experience in the techniques members of these organizations use to counter law enforcement operations.

6. Your affiant has attended and completed the Basic Course for Border Patrol Agents, the Criminal Investigator Training Program, and the HSI Special Agent Training Program at the Federal Law Enforcement Training Centers in Artesia, NM and Glynco, GA. Your affiant has a Bachelor of the Arts in Law and Justice Studies from Rowan University. Your affiant has received specialized training in constitutional criminal procedure, drug identification and recognition, interview/interrogation techniques, search and seizure, evidence collection, surveillance operations, and standard operating procedures pertaining to various transnational criminal organizations.

7. Through his training and experience, your affiant has obtained valuable knowledge about human smuggling activity and investigations. Your affiant received this

knowledge from training courses, other law enforcement officers/agents conducting human smuggling investigations, as well as from informants and suspects. Your affiant routinely receives intelligence updates about current trends and developments pertaining to human smuggling organizations and investigations from various locations around the United States, Mexico, and Central America.

8. Based on his background, training, and experience, you affiant knows that individuals who are involved in human smuggling and trafficking also do the following:

- a. Use cellular telephones to arrange, coordinate, and monitor criminal activities including communicating with smugglers, arrangers, and other transporters or drivers to coordinate their operations. They also use cellular telephones to communicate with these same individuals during counter-surveillance activities, and to warn co-conspirators of the presence of law enforcement or other obstacles to their plans.
- b. Maintain ledgers, both physically and electronically, to document the receipt and payment of monies. It is common for fees to be wired into bank accounts or directly from one person to another via money transfer services such as Western Union and Money Gram. These ledgers may also identify the recipients or senders of these funds, either by name or by other identifying information, such as phone or bank account numbers.
- c. Create and maintain documents to indicate the number of aliens smuggled, the cost or price of the alien smuggling, the final destination of the alien, and could outline the travel arrangements made to transport or move the alien to his final destination.

- d. Retain payments in the form of cash or other monetary instruments, such as money orders or checks. Often times, depending on the specific criminal scheme being employed, these payments may be in various states of liquidity. These payments can be the smuggler's proceeds of the criminal enterprise or monies which they use to pay drivers and others involved in the smuggling venture, as well as to buy food and other necessary supplies for the aliens under their control.
- e. Possess evidence belonging to previous victims, such as personal effects, photographs, or identifying documents. These possessions are sometimes retained in order to intimidate and control potential witnesses by implying that they could be located again, at a later time.

#### **SOURCES OF INFORMATION**

9. Your affiant is familiar with the circumstances described below, both through his personal participation in this investigation and by the discussions your affiant has had with other law enforcement officers who have knowledge of this case. This affidavit is being submitted for the limited purpose of securing a search warrant; therefore your affiant has not included every fact known to him or other law enforcement officers concerning this investigation. Your affiant has set forth below only the facts that your affiant believes are necessary to establish probable cause for the issuance of a search warrant.

#### **PROBABLE CAUSE**

10. In early October 2016, your affiant and other agents and task force officers from the Homeland Security Investigations (HSI) office in both Sells and Tucson,

Arizona began an investigation into an alien smuggling organization that utilizes numerous funnel bank accounts to acquire and move smuggling fees and illicit proceeds of alien smuggling. Audias SANCHEZ-Colin is one of the principle leaders running the organization in Phoenix, Arizona. SANCHEZ is in communication with individuals who are either family members or sponsors of illegal aliens, once the aliens make it to stash houses in Phoenix, Arizona. SANCHEZ is responsible for ensuring payments are made to the criminal organization before the illegal aliens are released from stash houses and transported to their final destinations by alien load drivers who work for SANCHEZ within the United States. SANCHEZ disseminates the banking institution and account numbers to the illegal alien's family or sponsors so that they are able to make cash deposits into these funnel accounts. Once payments are confirmed, SANCHEZ arranges the transportation and delivery of the illegal aliens to their intended destination.

11. On November 9, 2017, the Honorable Raner C. Collins, Chief United States District Court Judge for the District of Arizona, under WT-17-17-TUC-RCC, authorized the interception of wire and electronic communications to and from the cellular number (480) 261-2878 (TD#11), which is known to be used by SANCHEZ. The continued interception of TD#11 was authorized by Judge Collins on December 12, 2017, and again by The Honorable Frank R. Zapata, United States District Court Judge for the District of Arizona, on January 10, 2018. To date, agents have intercepted over 4,000 electronic and wire communications between SANCHEZ and other known and unknown co-conspirators that are pertinent to the ongoing criminal investigation.

12. On November 10, 2017 at approximately 10:29 a.m., SANCHEZ sent a text message to an unidentified male, using the phone number (561) 541-1657. The

content of the message included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA. On November 12, 2017, at 3:46 p.m., the unidentified male informed SANCHEZ that he will be depositing the entire amount tomorrow (November 13, 2017). SANCHEZ asked if he was depositing \$3,500 and the unidentified male again stated he would deposit the entire amount. SANCHEZ told the unidentified male that the name of the bank account would be under Marcelina MENDOZA in Virginia and the account number was xxxx41320482. The unidentified male verified that was the same information he received from a previous text message from SANCHEZ. SANCHEZ told the unidentified male to call him once the deposit was made. The unidentified male told SANCHEZ that he would make the deposit shortly after 9 a.m. on Monday (November 13, 2017). Banking information from Bank of America revealed a matching deposit of \$3,500 made into the account xxxx41320482 under the name Marcelina MENDOZA on November 13, 2017 in Delray Beach, Florida.

13. On November 10, 2017 at approximately 4:12 p.m., SANCHEZ sent a text message to an unidentified male, using the phone number (561) 346-6647. The content of the message included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA. At 5:01 p.m., the unidentified male informed SANCHEZ he would be making a deposit tomorrow because the bank was closed today due to the holiday (Nov 10<sup>th</sup>/Veterans Day). SANCHEZ told the unidentified male to go to Bank of America to make the deposit. SANCHEZ also told the unidentified male to bring a passport because the bank will ask for identification when making the deposit. SANCHEZ asked the unidentified male the amount he planned on depositing. The unidentified male replied that he would deposit \$1,000 and his uncle

would deposit another \$1,500. SANCHEZ then informed the unidentified male to send proof of the deposit with a receipt.

14. On November 17, 2017 at approximately 9:34 a.m., SANCHEZ sent a text message to a male individual identified as VENADO, using the international phone number 52 (963) 142-2872. VENADO asked SANCHEZ for the bank account information so he could make a deposit of \$600 for SANCHEZ. SANCHEZ then sent VENADO a text message. The content of the message included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA.

15. On November 19, 2017, SANCHEZ sent a text message to an unidentified female, using the phone number (732) 917-3462. SANCHEZ told the unidentified female he was going to send her an account number and for her to make a deposit of \$750. SANCHEZ then told the unidentified female to call him after the money was deposited. SANCHEZ sent a text message to the unidentified female. The content of the message included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA. The unidentified female told SANCHEZ she would make the deposit tomorrow and let SANCHEZ know when it was done.

16. On November 19, 2017, SANCHEZ placed a call to a male individual identified as ARSENIO, using the phone number (732) 674-8376. SANCHEZ told ARSENIO he was calling on behalf of his daughter GRISELDA (smuggled alien). SANCHEZ told ARSENIO that he was going to send him an account number so he could make a deposit of \$750. ARSENIO asked where the account was located and SANCHEZ told him it was based in Phoenix, Arizona. SANCHEZ sent a text message to ARSENIO.



The content of the message included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA. SANCHEZ told ARSENIO to go to the bank and make the deposit. ARSENIO asked SANCHEZ if it was a Bank of America and SANCHEZ replied that it was and it was based in Virginia. ARSENIO then asked SANCHEZ when GRISELDA would be dropped off. SANCHEZ told ARSENIO that GRISELDA would be transported tomorrow (November 21<sup>st</sup>/Tuesday). ARSENIO told SANCHEZ that he was currently at work, but would make the deposit after getting off work. SANCHEZ told ARSENIO there were Bank of America branches in New Jersey and a lot of people make deposits in that area. SANCHEZ further told ARSENIO to take his passport with him when he goes to make the deposit. At 10:43 a.m., ARSENIO sent SANCHEZ a message informing SANCHEZ that ARSENIO went to the bank and was unable to make a deposit into the account for Marcelina MENDOZA. Then at 10:55 a.m., ARSENIO told SANCHEZ he will send SANCHEZ a message when the deposit is complete. Banking information from Bank of America revealed a deposit of \$750 made into the account xxxx41320482 under the name Marcelina MENDOZA on November 20, 2017 in Lakewood, New Jersey.

17. On November 25, 2017 at approximately 7:47 a.m., SANCHEZ sent a text message to an unknown individual, using the phone number (848) 299-2158. The content of the message included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA. The unknown individual called SANCHEZ and asked for all the banking information, including the postal zip code for the bank. SANCHEZ asked the unknown individual if the deposit being made was for \$600, to which the unknown individual confirmed saying it was. SANCHEZ

then told the unknown individual the account is a Virginia bank account. SANCHEZ sent a text message to the unknown individual. The content was an address for the request of the unknown individual, 4103 Tyrone Street, Richmond Virginia, 23234. The unknown individual acknowledged the address from SANCHEZ and SANCHEZ thanked the unknown individual. Banking information from Bank of America revealed a deposit of \$600 made into the account xxxx41320482 under the name Marcelina MENDOZA on November 27, 2017 in Lakewood, New Jersey.

18. On November 25, 2017 at approximately 7:48 a.m., SANCHEZ placed a call to an unidentified female at phone number (732) 535-6873. SANCHEZ told the unidentified female to deposit \$600 for JOSE (smuggled alien). The unidentified female told SANCHEZ that she doesn't have any money. SANCHEZ told the unidentified female to call FRANCISCO and work on getting \$600 to SANCHEZ. SANCHEZ sent a text message that included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA. The unidentified female later informed SANCHEZ that she got the money and would make a deposit into the Marcelina MENDOZA account. SANCHEZ told the unidentified female to let him know when she does. The unidentified female called SANCHEZ and told him that she was paying for JOSE. The unidentified female asked SANCHEZ if the account number was xxxx41320482. SANCHEZ confirmed that was the correct account number. SANCHEZ further told the unidentified female the bank was based in Virginia. The unidentified female told SANCHEZ she would notify him after the deposit was made. The unidentified female called SANCHEZ and told him the deposit was complete. The unidentified female asked SANCHEZ when JOSE would be sent. SANCHEZ replied,

saying JOSE would be sent tomorrow (November 26<sup>th</sup>/Sunday). Banking information from Bank of America revealed a second, separate deposit of \$600 made into the account xxxx41320482 under the name Marcelina MENDOZA on November 27, 2017 in Lakewood, New Jersey.

19. On November 25, 2017 at approximately 10:03 a.m., SANCHEZ sent a text message to CHAPULIN, using the international phone number 52 (637) 106-4996. The content of the message included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA. On November 27, 2017, CHAPULIN told SANCHEZ that he deposited \$1,600 into the account and would pay the other \$700 over here (presumably Mexico based on the international phone number). Banking information from Bank of America revealed a deposit of \$1,700 made into the account xxxx41320482 under the name Marcelina MENDOZA on November 27, 2017 in Bronx, New York.

20. On November 27, 2017, at approximately 6:59 a.m., SANCHEZ received a call from an unidentified male at phone number (318) 732-1692. The unidentified male told SANCHEZ that he does not have a Bank of America near him in Monroe, Louisiana. The unidentified male told SANCHEZ he was going to a Bank of America that was an hour away from Monroe to make the deposit. SANCHEZ reminded the unidentified male to take a passport for identification. The unidentified male told SANCHEZ that he did not have a passport and he would have to find someone else to make the deposit for him. The unidentified male asked for verification of the account information. SANCHEZ told the unidentified male the name of the bank (Bank of America), the state the account was based in (Virginia), and the name on the account (Marcelina MENDOZA). The

unidentified male asked SANCHEZ for the routing number so he could make the deposit. SANCHEZ told the unidentified male the bank does not ask for that type of information since it is not a wire transfer. The unidentified male told SANCHEZ that he would let him know when it was complete. The unidentified male told SANCHEZ the lady at the bank was asking for the address associated to Marcelina's account. SANCHEZ sent the unidentified male the address 4103 Tyrone Street, Richmond, Virginia, 23234. SANCHEZ asked the unidentified male what part of Louisiana SERENE (smuggled alien) is to be delivered. The unidentified male told SANCHEZ Monroe, Louisiana. The unidentified male then told SANCHEZ he has the money with him and is ready to receive SERENE. SANCHEZ told him the problem was that GUERA (facilitator in Honduras) needed to be paid the money and the unidentified male could not just pay for SERENE with cash. SANCHEZ asked the unidentified male if he had made the deposit yet. The unidentified male replied that he did. The unidentified male asked SANCHEZ when SERENE would be leaving. SANCHEZ told him it would be today (November 27<sup>th</sup>). Banking information from Bank of America revealed a wire transfer in the amount of \$3,600 made into the account xxxx41320482 under the name Marcelina MENDOZA on November 28, 2017. The originator of the wire transfer was Francisco RAMOS.

21. On December 3, 2017, at approximately 2:35 p.m., SANCHEZ received a call from an unidentified male at phone number (919) 327-8486. SANCHEZ told the unidentified male that he would be sending him account information to a Bank of America in order for the unidentified male to make a deposit. The unidentified male acknowledged and agreed. SANCHEZ sent a text message that included a bank, account number, and name associated to the account: Bank of America, xxxx41320482,

Marcelina MENDOZA. On December 4, 2017, at 9:35 a.m., SANCHEZ asked the unidentified male if he was able to deposit \$2,000 into the account of Marcelina MENDOZA. The unidentified male told SANCHEZ he did yesterday and it was sent to Bancoppel (a Mexican bank). SANCHEZ asked the unidentified male what was the name on the Bancoppel account. The unidentified male said he could not remember, but would check and send SANCHEZ the information.

22. On December 5, 2017, at approximately 8:49 a.m., SANCHEZ spoke to an unidentified male at phone number (443) 409-2918. SANCHEZ told the unidentified male he was going to send him a bank account so that the unidentified male can make a deposit. The unidentified male asked the dollar amount he needed to deposit. SANCHEZ told him the total amount was \$6,700. The unidentified male said it should be \$3,000. SANCHEZ told the unidentified male he would call him back. The unidentified male said he spoke to GUERA (facilitator in Honduras) and told SANCHEZ he only owed \$3,000. SANCHEZ told the unidentified male that he would send the Bank of America account information later in the day. The unidentified male told SANCHEZ the deposit was for DANIEL (smuggled alien). SANCHEZ sent a text message that included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA. SANCHEZ told the unidentified male the account was based in Virginia if anyone at the bank inquired. The unidentified male told SANCHEZ that he had the money and will make two deposits tomorrow (December 6<sup>th</sup>/Wednesday). SANCHEZ told the unidentified male to have \$3,000 for a deposit, then another \$600 for the ride for DANIEL. On December 6, 2017, the unidentified male told SANCHEZ there was a problem at the bank and he was unable to make the deposit. The unidentified male

told SANCHEZ he would have to pay SANCHEZ via money orders. SANCHEZ told the unidentified male to get three money orders for \$1,000 each. On December 7, 2017, at 7:11 a.m., SANCHEZ told the unidentified male to take the three money orders he had purchased to a Bank of America and deposit those into the Marcelina MENDOZA account (as shown below, however, four money orders were actually deposited). The unidentified male asked SANCHEZ for the address and phone number associated to the Bank of America account. SANCHEZ sent a message to the unidentified male including the address 4103 Tyrone Street, Richmond, Virginia, 23234 and phone number (804) 334-9608. At 11:56 a.m., the unidentified male told SANCHEZ the deposit was complete and he did not have any problems with the transaction. At 5:01 p.m., SANCHEZ told the unidentified male that the wire transfers were blocked because the amount of money was over \$1,000. SANCHEZ told the unidentified male that wire transfers will not work the same as a deposit. SANCHEZ told the unidentified male he needed to make three \$1,000 deposits into accounts with different names (Epifanio COTA-Cota, Edgar Cecilio COTA-Ruiz, and Javier Eduardo COTA-Ruiz). Banking information from Bank of America revealed four Western Union money orders, each made out to Marcelina MENDOZA with the account number xxxx41320482, and dated December 7, 2017. The address written on each of the four money orders was 4103 Tyrone Street, Richmond, Virginia. The four money orders were as follows: one in the amount of \$200, one in the amount of \$800, and two in the amount \$1,000 each, totaling \$3,000.

23. On December 5, 2017, at approximately 3:33 p.m., SANCHEZ spoke to an unidentified male at phone number (270) 695-9044. SANCHEZ told the unidentified male to deposit the money by tomorrow for the alien because he has already been sent.

The unidentified male asked SANCHEZ how much the total was. SANCHEZ told him \$4,000. SANCHEZ told the unidentified male he would send him a Bank of America account based in Virginia. The unidentified male told SANCHEZ he was in Bradenton, Florida and he would look for any Bank of America branches. The unidentified male asked SANCHEZ if he can make two deposits because he only has \$1,500 with him. The rest of the unidentified male's money was in Guatemala. SANCHEZ told the unidentified male to deposit the \$1,500 for now. SANCHEZ sent a text message that included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA. The unidentified male told SANCHEZ the money will be deposited tomorrow (Wednesday/Dec 6<sup>th</sup>). Banking information from Bank of America revealed a deposit of \$4,000 made into the account xxxx41320482 under the name Marcelina MENDOZA on December 6, 2017 in Bradenton, Florida.

24. On December 5, 2017, at approximately 7:30 p.m., SANCHEZ spoke to LUISITO using international phone number 52 (637) 124-0428. SANCHEZ sent a text message that included a bank, account number, and name associated to the account: Bank of America, xxxx41320482, Marcelina MENDOZA. LUISITO told SANCHEZ since LUISITO had money for Mexico, a Bancoppel bank would be better to transfer the money. SANCHEZ told LUISITO he would send LUISITO an account based in Mexico. SANCHEZ then told LUISITO that the load (vehicle with illegal aliens) had already left at 4:00 a.m. that same morning.

25. HSI Special Agents identified Marcelina MENDOZA as likely residing at 4103 Tyrone Street in Richmond, Virginia. This information was based on intercepted calls, from WT-17-17-TUC-RCC, and by SANCHEZ distributing the address in

conjunction with Marcelina MENDOZA's name and bank account. Agents believe this information is provided by SANCHEZ due to recent procedural changes made at Bank of America in which out of state depositors are being asked to provide the name and address of the account holder as a way to curb money laundering.

26. Analysis of intercepted Title III communications revealed that Bank of America and BB&T bank accounts belonging to Marcelina MENDOZA were provided by SANCHEZ more than 30 times, between October 2017 and January 2018. During each of these intercepted communications, SANCHEZ requested deposits to the accounts ranging from \$600 to several thousand dollars. Analysis of the intercepted communications has revealed that SANCHEZ provides the bank accounts belonging to Marcelina MENDOZA more frequently than any other funnel account linked to this organization, and that a larger amount of illegal proceeds pass through her accounts than any other person known to be affiliated with the alien smuggling and money laundering organization.

27. Of further note, this investigation has identified Marcelina MENDOZA-Mendoza as the sister of the Honduran-based leader of this alien smuggling and money laundering organization, Maria MENDOZA-Mendoza (aka GUERA). During the course of this investigation, agents have been unable to identify how the proceeds of alien smuggling earned by Maria MENDOZA are being delivered to her in Honduras. Based on the regularity with which the smuggling organization uses the bank accounts belonging to Marcelina MENDOZA, agents believe that Marcelina MENDOZA is collecting monies due to her sister, Maria MENDOZA, and sending these proceeds to Honduras through an unknown means. Agents believe evidence of the movement of these



monies, such as wire transfer receipts, will be present in the home of Marcelina MENDOZA.

28. Between January 4, 2018 and January 7, 2018, HSI Special Agents, including your affiant, conducted multiple iterations of surveillance at 4103 Tyrone Street in Richmond, Virginia. During this surveillance, on January 4, 2018, agents observed several vehicles parked outside 4103 Tyrone Street in Richmond, Virginia. Records checks revealed at least two of the vehicles were registered to Marcelina MENDOZA at 4103 Tyrone Street. While these vehicles are not known to be involved in the criminal conspiracy, they continue to show Marcelina MENDOZA's possession, dominion, and/or control of the premises at 4103 Tyrone Street. A query of driver license indices for the state of Virginia also revealed Marcelina MENDOZA applied for but did not receive a Virginia driver license. The only information available from the query is Marcelina MENDOZA's name and date of birth and the address 4103 Tyrone Street in Richmond, Virginia.

29. On January 5, 2018, agents observed two middle aged Hispanic males and one female juvenile move furniture and other household items into a white pickup truck bearing Virginia license plate XGB5320. Agents maintained physical surveillance on this pickup truck as it left 4103 Tyrone Street and followed it to 4436 Angus Road. At this address, agents observed several vehicles registered to Marcelina MENDOZA previously parked at 4103 Tyrone Street now parked in the backyard of 4436 Angus Road.

30. On January 7, 2018, agents conducted surveillance on 4103 Tyrone Street and were able to observe from the street through unobstructed windows, that the residence appeared to be devoid of any furniture, decorations, or adornments in those

immediate rooms. On January 16, 2018, agents conducted surveillance on 4103 Tyrone Street and observed essential furniture such as mattresses and sofas stacked up in the backyard. Agents also observed vehicles registered to Marcelina MENDOZA continued to be parked at the 4436 Angus Road address.

31. Based on the above observations, agents believe the occupants of 4103 Tyrone Street, including Marcelina MENDOZA, began moving to 4436 Angus Road on or about January 5, 2018. Furthermore, agents believe evidence including records, notes, ledgers, and other documents detailing monies received and other accounting of the alien smuggling and money laundering scheme was moved to 4436 Angus Road in Richmond, Virginia.

32. On January 10, 2018, Marcelina MENDOZA-Mendoza, her sister Maria MENDOZA-Mendoza aka GUERA, Marcelina's son Oscar LOPEZ-Mendoza, and others were indicted, in the District of Arizona, for violations related to alien smuggling and money laundering.

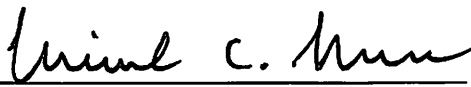
**CONCLUSION**

33. Based on the information contained within this affidavit, your affiant submits that there is sufficient probable cause to believe the residence of Marcelina MENDOZA-Mendoza, more fully described in Attachment B, which is located at 4436 Angus Road, Richmond, VA, contains evidence of the crime of alien smuggling, in violation of 8 U.S.C. § 1324 and/or evidence of the crime money laundering, in violation of 18 U.S.C. § 1956 and 18 U.S.C. § 1957.


Respectfully submitted,

  
\_\_\_\_\_  
Steve Lee, Special Agent  
Homeland Security Investigations

Reviewed and approved:

  
\_\_\_\_\_  
Michael C. Moore  
Assistant United States Attorney

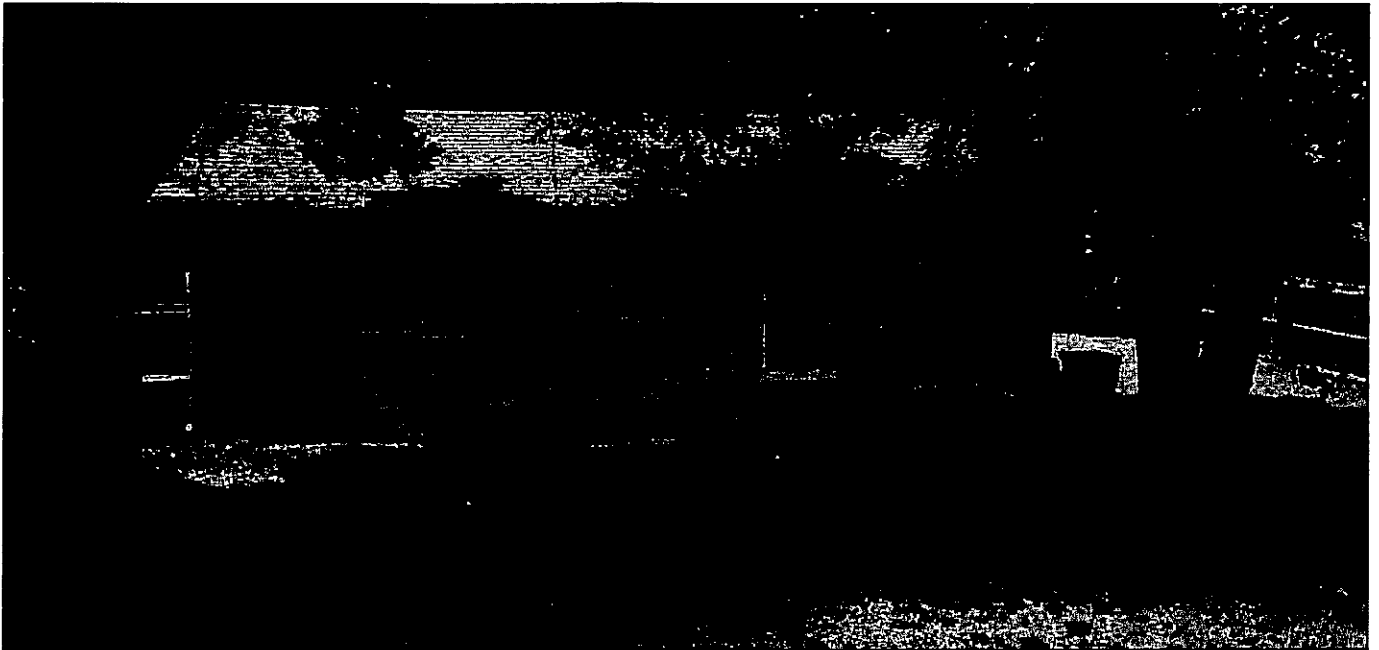
Subscribed and sworn to before me on January 22, 2018:

  
\_\_\_\_\_  
/s/  
Roderick C. Young  
United States Magistrate Judge

**ATTACHMENT A**

**DESCRIPTION OF THE PREMISES TO BE SEARCHED**

4436 Angus Road, is a single-family detached residential structure located within the City of Richmond, Virginia. The residence is further described as crème or tan in color and has a brown shingled roof. From Walmsley Boulevard, going north, it is the second residence on the west side of Angus Road. The front door is brown with an oval shaped window centered on the door. There is white trim around the sides of the front door and the number 4436 is vertically on the right side of the front door.



**ATTACHMENT B**

**DESCRIPTION OF THE PROPERTY TO BE SEIZED**

The property to be seized is evidence of offenses in violation of Title 8 U.S.C. § 1324, Title 18 U.S.C. §§ 1956 and 1957, including, but not limited to, the following:

1. Documents showing possession, dominion, and/or control of premises located at the residence to be searched, including utility statements, telephone statements, correspondence with other persons or entities, and rental or lease agreements relating to the premises to be searched;
2. Immigration and identification documents from the United States or any foreign government;
3. Cellular telephones and any other portable electronic devices, to include tablet computers, with the capability of storing information and wirelessly communicating with other similar devices;
4. Records, including but not limited to, books, ledgers, notes, correspondence, lists, receipts, transportation tickets, credit card statements and receipts, rental receipts, hotel receipts, meal receipts, deposit and investment records, telephone tolls, telegrams, financial transaction records, money orders, and other papers which evidence the obtaining, secreting, transfer and/or concealment of assets;
5. Address and/or telephone books and papers reflecting names, addresses and/or telephone numbers of co-conspirators and others involved in the transportation, concealment, or harboring of smuggled aliens or involved with the proceeds of such activities;
6. Financial records that are evidence of payments made to alien smugglers or received from smuggled aliens and their sponsors; and
7. United States and/or foreign currency in amounts over \$1,000.